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IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA

SARAH PEREZ; MICHELLE LACKNEY;
RACHEL STEWART; RACHEL
HARDYCK, on behalf of themselves and
all others similarly situated,

Plaintiffs,

v.

STATE FARM MUT. AUTO. INS. CO., an
Illinois corporation; ALLSTATE INS. CO.,
an Illinois corporation; GEICO, a Maryland
corporation; CERTIFIED AUTO. PARTS
ASS'N, doing business in Washington,
D.C.; LIBERTY MUT. INS. CO., a
Massachusetts corporation; and UN
NAMED INSURANCE CONSPIRATORS,

Defendants.

Case No. C06-01962 (JW) (PSG)

STIPULATION AND ~~PROPOSED~~
ORDER REGARDING CLASS
DISCOVERY SCHEDULE AND
DEADLINES

STIPULATION

Pursuant to the Court's June 3, 2011 Order Denying Motion for Administrative Relief (Docket Entry No. 351), Plaintiffs Sarah Perez, Michelle Lackney, Rachel Stewart and Rachel Hardyck (collectively "Plaintiffs") and Defendants State Farm Mutual Automobile Insurance Company, Allstate Indemnity Company, GEICO General Insurance Company, Certified Automotive Parts Association, and Liberty Mutual Fire Insurance Company (collectively "Defendants"), by and through their respective undersigned counsel, have met and conferred to work out a suitable discovery plan to complete class discovery, stipulate and agree as set forth below, and respectfully request that the Court approve and give effect to their stipulation:

1. The parties shall personally serve supplemental reports for all affirmative experts no later than July 6, 2011, including CD's with digitized images of all documents reviewed.

2. The parties shall personally serve supplemental reports for all rebuttal experts no later July 18, 2011, including CD's with digitized images of all documents reviewed.

3. For experts retained by Plaintiffs, the CD's referenced in paragraphs 1 and 2 above shall be personally served on the San Francisco office of SNR Denton US LLP for all Defendants, and for experts retained by Defendants, the CD's shall be personally served on Kellogg, Huber, Hansen, Todd, Evans & Figel, P.L.L.C. for all Plaintiffs.

4. Depositions of class experts shall take place between July 18, 2011 and July 26, 2011 according to the following schedule:

Plaintiffs' Class Expert Noll: Thursday, July 21, 2011 at 9 am

Defendants' Class Expert Rubinfeld: Friday, July 22, 2011 at 9 am

Defendants' Class Expert Vogler: Monday, July 25, 2011 at 9 am

Defendants' Class Expert Cripe: Tuesday, July 26, 2011 at 9 am

5. Under the Court's April 13, 2011 Order (Docket Item No. 298), class discovery currently closes on July 13, 2011. A 13-day extension of the class discovery deadline to July 26, 2011 is necessary to complete class discovery and will not affect the September 12, 2011 hearing date on Plaintiffs' anticipated motion for class certification. Other than the modification

of the class discovery schedule set forth in Court's April 13, 2011 Order, no other extensions or modifications have been obtained.

6. Defendants agree that by entering into this Stipulation, Plaintiffs have not waived their pending motion to exclude Defendants' class experts to be heard by this Court on July 11, 2011.

7. Plaintiffs reserve the ability to reasonably refine Plaintiffs' July 6th supplementation no later than July 15, 2011 as to data or information produced on or after May 27, 2011, and Defendants reserve the ability to reasonably refine Defendants' July 18th supplementation no later than 48 hours prior to the deposition of the respective Defendants' Class Expert.

IT IS SO STIPULATED ON JUNE 14, 2011.

By //S//
On Behalf of All Plaintiffs

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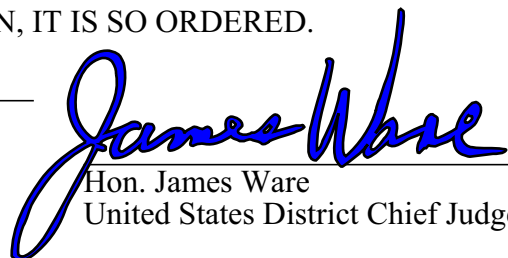
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27 ATTORNEYS FOR LIBERTY MUTUAL
28 FIRE INSURANCE COMPANY

PROPOSED ORDER

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated: June 16, 2011


Hon. James Ware
United States District Chief Judge

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CERTIFICATION

I, Steven H. Frankel, am the ECF User whose identification and password are being used to file this Stipulation and [Proposed] Order Regarding Class Discovery Schedule and Deadlines. In compliance with General Order 45.X.B. I hereby attest that counsel for all parties concurred in this filing.

Dated: June 14, 2011

/s/ Steven H. Frankel
Steven H. Frankel